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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ZACHARY HILE, on behalf of himself and all others similarly situated,)	Case No.: CV-07-00716 SBA
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
v.)	DECLARATION OF WILLIAM A.
)	BAIRD IN SUPPORT OF
RITZ CAMERA CENTERS, INC.,)	MOTION FOR PRELIMINARY
)	APPROVAL OF CLASS ACTION
Defendant.)	SETTLEMENT
)	
)	Date: June 3, 2008
SHOGHER ANDONIAN, individually and on behalf of all others similarly situated,)	Time: 1:00 PM
)	Ctrm: 3, 3 rd Floor
Plaintiff,)	Hon. Sandra B. Armstrong
)	
v.)	
)	
RITZ CAMERA CENTERS, INC., a)	
Delaware corporation; and DOES 1 through)	
10, inclusive,)	
)	
Defendants.)	

BAIRD DECLARATION ISO PRELIMINARY APPROVAL OF CLASS SETTLEMENT
Case No.: CV-07-00716 SBA

1 I, WILLIAM A. BAIRD, do hereby declare and state as follows:

2 1. I am an attorney at law, licensed to practice before the courts of the State
3 of California and this Court. I am a senior associate with Milstein, Adelman, & Kreger,
4 LLP ("MAK") in Santa Monica, California, attorneys of record for plaintiff Shogher
5 Andonian and proposed Settlement Class Plaintiffs' Counsel in this action. I have
6 personal knowledge of the matters stated herein and, if called as a witness, I could and
7 would competently testify thereto.

8 2. I have been employed at MAK since 2004. I previously worked at Hiepler
9 & Hiepler, LLP and The Quisenberry Law Firm, where I practiced exclusively in the area
10 of complex multi-party and class action litigation involving employment wage and hour
11 issues, consumer fraud, products liability, insurance bad faith, and catastrophic injury
12 cases.

13 3. I have served as a counsel or as co-counsel for class members in numerous
14 class actions that settled. These include:

- 15 a. *Ochoa, et al. v. Haralambos Beverage Co.* (Los Angeles County
16 Super. Ct. 2007 Case No. BC319588) (a wage and hour class action on
17 behalf of Sales Representatives seeking overtime compensation that
18 resulted in a \$1.3 million settlement);
- 19 b. *Daum v. Claim Jumper Restaurants* (Orange County Super. Ct. 2006
20 Case No. 02CC10201) (a wage and hour class action on behalf of
21 Assistant Kitchen Managers that resulted in a \$6.5 million dollar
22 settlement);
- 23 c. *Moore v. IKEA* (Los Angeles County Super. Ct. 2006 Case No. BC
24 263646) (a wage and hour class action on behalf of Store Managers for
25 overtime that resulted in a seven figure settlement);
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- d. *Kimbell v. Abercrombie & Fitch Stores, Inc.* (Los Angeles County Super. Ct. 2006 *Case No.* BC 277359) (a wage and hour class action on behalf of Store Managers for overtime that resulted in a more than \$2 million dollar recovery);
- e. *Estrada, et al. v. Dr. Pepper/Seven-Up* (Los Angeles County Super. Ct. May 2005) (a wage and hour class action on behalf of Sales Representatives in California seeking overtime compensation that resulted in a \$10 million dollar recovery);
- f. *Moreno v. Miller Brewing* (Los Angeles County Super. Ct. April 2004 BC 278170) (a wage and hour class action on behalf of Sales Representatives in California seeking overtime compensation that resulted in a \$1.35 million dollar recovery);
- g. *Big Lots Overtime Cases* (San Bernardino County Super. Ct. February 2004, JCCP Proceeding No. 4283) (a wage and hour class action on behalf of Store Managers and Assistant Managers for overtime that resulted in a \$10 million dollar recovery);
- h. *Evans et al. v. Coca-Cola* (Los Angeles County Super. Ct. 2001 *Case No.* BC 220525) (a wage and hour class action on behalf of over a 1,000 Sales Representatives in California seeking overtime compensation that resulted in a \$20.2 million dollar recovery); and
- i. *Fitzpatrick v. Baja Fresh*, (Los Angeles Super. Ct. 2003 *Case No.* BC 265578) (a wage and hour class action on behalf of Store Managers for overtime that resulted in a seven figure settlement).

4. Presently, I devote all of my practice to handling complex litigation and class actions. I am currently involved in several consumer class actions pending in both federal and state courts across the county.

5. Launa Everman is an associate at MAK and is licensed to practice before all courts of this state. Ms. Everman's litigation practice focuses on consumer class actions arising under the Consumer Legal Remedies Act (California Civil Code section 1750 *et seq.*), Business and Professions Code section 17200 and other consumer-protection statutes.

6. Ms. Everman is currently serving as co-lead counsel in the certified class action entitled *La Rosa v. Nutramerica Corp., et al.*, Los Angeles Superior Court, Case No. BC 309427. She currently represents consumers in a number of other class actions pending in both federal and state courts.

7. MAK is a group of twenty-three (23) trial lawyers specializing in representing consumers and other plaintiffs in complex multi-party litigation and class actions involving consumer fraud, insurance bad faith, products liability, mass construction defect, and employment issues.

8. MAK has represented plaintiffs in more than 250 complex actions recovering in excess of \$300 million and currently represents persons in a number of class actions pending throughout the state of California involving consumer products and consumer fraud class actions.

9. In the past several years, attorneys at the firm have served as lead class counsel or are serving as lead class counsel in several additional certified class actions, including the following:

- a. *Abigana, et al. v. Rylock Company Ltd.*, Alameda County, Case No. 2002 076625;
- b. *Klotzer, et al. v. International Windows*, Solano County Superior Court Case No. FCS 021196;
- c. *Hufschmidt v. Allstate Insurance Company*, Los Angeles County Superior Court Case No. BC291782;

- 1 d. *Susman v. Mercedes Benz, LLC, et al.*, Los Angeles Superior Court
2 Case No. BC311375; and
3 e. *Shaffer v. Continental Casualty Co., et al.*, Central District of
4 California Case No. CV06-2235-RGK (PJWx).

5 I declare, under penalty of perjury, under the laws of the United States, that the
6 foregoing is true and correct. Executed this 18th day of April, 2008 at Santa Monica,
7 California.

8
9 /s/
10 WILLIAM A. BAIRD
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